

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

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In the Matter of )

Comcast Corp., )

Time Warner Cable Inc., )  
\_\_\_\_\_ )

MB Docket No. 14-57

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**JOINT PETITION TO DENY OF**  
**TVC United States, Inc.**

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August 25, 2014

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**PETITION TO DENY**

**I. INTRODUCTION**

TVC United States, Inc., an independent television network, respectfully and with great concern files this petition to deny of the proposed merger of broadcasting firms Comcast Corp., and Time Warner Cable ("TWC"). By allowing this merger to proceed it would ultimately harm and have a negative impact on competition, minority owned and independent networks, and restrict the media content channels available to the public.

According to Comcast and TWC this merger between both companies would not affect competition as they will be competing in different territories. This is clearly not true, currently Comcast and TWC already dominate a large portion of the market and with this merge it will only solidify their advantage and control. Thus, negatively affecting independent networks by impeding them to be widely distributed and obtain viewership if not carried by

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<sup>1</sup> TVC United States, Inc., a spanish independently minority owned network broadcasting in the United States.

these cable providers. In other words, if Comcast and TWC refuse to carry a broadcast network they will not be able to compete as not being carried by Comcast or TWC means the broadcaster will miss a large portion of national viewers.

Furthermore, small competitors and independently owned networks will be negatively affected as they are often ignored. TVC United States, Inc., a minority independently owned network, has in numerous attempts presented the network and it's widely diversified content directed to a Hispanic community and has been time after time denied with not a justifiable excuse. At least, currently we are currently able to compete and survive as an independently owned network if we are not able to penetrate the national viewers on Comcast and TWC we still can be carried by smaller cable providers. However, if Comcast and TWC merge than a company as ours will not be able to survive by missing such a large share of viewers. It would give a single company control over the industry and that much control is catastrophic for smaller competitors.

Comcast Corp., also identified as NBC Universal owns its own broadcasted networks which directly makes them a competitor to broadcaster's specifically Hispanic networks in this case. NBC Universal Television Group, is owner of American Spanish television network Telemundo. Not only will Comcast compete with other cable providers but also broadcasters.

This will also present a restriction of content to viewers, currently Telemundo airs widely popular television show "El Senor de los Cielos" that displays and promotes drug cartels. With such a small selection of Spanish television shows, Hispanics viewers should be entitled to educational yet entertaining content not degrading. The American Spanish television industry is young and limited with content. Allowing such a large company such as Comcast to have control of what channels and content is carried is concerning.

Furthermore, this will dramatically affect minority communities. With such control over the industry Comcast and TWC will be able to offer competitive prices and gain minority communities as larger number of its subscribers. Minority communities will be misrepresented by such networks like NBC Universal.

If more American minority owned networks were carried and broadcasted there would be better representation and more options for content available to minority communities such as Hispanic community. Cable providers have the power to restrict competitive content media, and in this case Comcast has its own interest as a network. Comcast and TWC control and size would give it excessive power to regulate what programming is worth carrying, and at what cost to the program content provider. Thus, content providers such as TVC with a smaller audience will find it more difficult to affordably reach their viewers.

As a proposed solution Comcast and TWC should be prevented from merging due to the negative affect and the monopolistic power it will give such companies. So much power given to one company is unreasonable and devastating for smaller independent networks that have struggled to survive without the support of large companies like these.